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Attorneys for United States of America

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

UNITED STATES OF AMERICA,)	No. CR 14-00296 JST
)	
Plaintiff,)	STIPULATION AND PROPOSED ORDER
)	EXCLUDING TIME UNDER THE SPEEDY TRIAL
v.)	ACT
)	
EDGARDO DUARTE,)	
)	
Defendant.)	

STIPULATION

Defendant Edgardo Duarte, represented by Attorney Linda Fullerton, and the government, represented by Assistant United States Attorney Chinhayi Cadet, appeared before the Honorable Jon S. Tigar on June 10, 2016 for a status hearing. At the hearing, the defendant withdrew his motion for new counsel. The Court put the matter over to September 23, 2016, at 2:00 p.m., and excluded time for effective preparation of counsel.

On August 1, 2016, the parties received a Clerk's Notice, continuing the matter to September 30, 2016, at 2:00 p.m. Counsel for Duarte continues to review the discovery in this wiretap case, investigate this matter, and confer with Duarte, taking into account the exercise of due diligence. Consequently, the continuance allows for effective preparation of counsel for Duarte, taking into account the exercise of

STIPULATION AND [PROPOSED] ORDER
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1 due diligence.

2 Defendant Duarte and the government agree that the ends of justice served by excluding the
3 period from September 23, 2016 to September 30, 2016 from Speedy Trial Act calculations outweighs
4 the interests of the public and the defendant in a speedy trial by allowing for the effective preparation of
5 counsel, in accordance with 18 U.S.C. § 3161(h)(7)(A) and (B).

6 IT IS SO STIPULATED.

7 Dated: August 31, 2016

/s/
LINDA FULLERTON
Counsel for Defendant Edgardo Duarte

BRIAN J. STRETCH
Acting United States Attorney

11 Dated: August 31, 2016

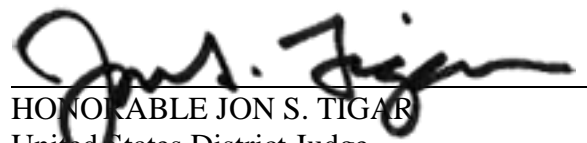
/s/
CHINHAYI COLEMAN CADET
Assistant United States Attorney

14 **[PROPOSED] ORDER**

15 For good cause shown, the Court Hereby Orders that the period September 23, 2016 to
16 September 30, 2016 is excluded from the Speedy Trial Act calculations as to Defendant Edgardo Duarte
17 for effective preparation of counsel and pursuant to 18 U.S.C. §§ 3161(h)(7)(A) and (B)(iv).

18 IT IS SO ORDERED.

19 DATED: September 1, 2016


HONORABLE JON S. TIGAR
United States District Judge